

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND CALIFORNIA DEPARTMENT OF
FORESTRY AND FIRE PROTECTION
EXTENDING TIME TO RESPOND TO
LEASE ASSUMPTION MOTION**

Re: Dkt. No. 3726

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the California
4 Department of Forestry and Fire Protection (“**CAL FIRE**”), on the other hand. The Debtors and
5 CAL FIRE are referred to in this Stipulation and Agreement for Order collectively as the
6 “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On August 27, 2019, the Debtors filed the *Fifth Omnibus Motion of the Debtors*
9 *Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order*
10 *Approving Assumption of Certain Real Property Leases* [Dkt. No. 3726] (the “**Lease**
11 **Assumption Motion**”), which is set for a hearing before the Court at 9:30 a.m. on September 24,
12 2019. Any response or opposition to the Lease Assumption Motion is due by 4:00 p.m. (Pacific
13 Time) on September 10, 2019.

14 B. Counsel for CAL FIRE has requested, and counsel for the Debtors has agreed,
15 that the time for CAL FIRE to respond to the Lease Assumption Motion be extended.

16 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
17 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
18 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
19 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
20 **THAT:**

21 1. The time for CAL FIRE to file and serve any response or opposition to the Lease
22 Assumption Motion is extended through 4:00 p.m. (Pacific Time) on September 13, 2019.

23 *[Signatures on next page]*
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: September 9, 2019
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp
Thomas B. Rupp

*Attorneys for Debtors
and Debtors in Possession*

Dated: September 9, 2019
XAVIER BECERRA
Attorney General of California
MARGARITA PADILLA
Supervising Deputy Attorney General

/s/ Paul J. Pascuzzi
STEVEN H. FELDERSTEIN
PAUL J. PASCUZZI
FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS
LLP

*Attorneys for California Department of
Forestry and Fire Protection*